

Chang, Lisa

From: Byron, Carrie
Sent: Wednesday, August 28, 2013 4:49 PM
To: Chang, Lisa; Castner, Chris; Bonifaci, Angela; Wilcox, Michelle; Mendelman, Krista; Rylko, Michael; Hanft, Sally; Bonifacino, Gina
Subject: RE: Paperwork Reduction Act/Information Collection Rule requirements?

Hi all,

Chris and I had a conversation about this recently and he pointed me to this document that Dan Steinborn prepared when the LO agreements were being developed listing which T&Cs passed through to subawards: [G:\Baker\1 PUGET SOUND TEAM\Grants\Grants References, training, other resources\Pass-thru Conditions rev 3-7 DIS TRF.docx](#)

This document indicates that this particular T&C does not pass on to subawardees. In fact that's what I just told the Marine and Nearshore LO when they launched their Social Marketing subaward recently, so it would be good to get that information soon.

Thanks!

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From: Chang, Lisa
Sent: Wednesday, August 28, 2013 4:18 PM
To: Castner, Chris; Bonifaci, Angela; Wilcox, Michelle; Mendelman, Krista; Byron, Carrie; Rylko, Michael; Hanft, Sally; Bonifacino, Gina
Subject: Paperwork Reduction Act/Information Collection Rule requirements?

Hi all,

I have a situation where a Tribal LO subawardee project involves a survey. Although the "Paperwork Reduction Act/Information Collection Rule" programmatic T&C is in some of our Puget Sound cooperative agreements, for some reason, it was not included in the Tribal LO award.

My understanding is that regardless of whether a Federal requirement is explicitly captured in a T&C in the award document, the recipient is required to comply with all applicable Federal requirements – which would mean that PRA/ICR is applicable to the LOs.

Furthermore, my understanding is that this requirement would flow down to subawardees as well.

Thoughts?

L